REMARKS

Claims 1-3. 5-17, 19-30, and 33-38 are pending and stand rejected. Claims 4, 18, 31, and 32 have been cancelled, and Claims 1, 5, 6, 15, 19, 29, and 33 have been amended. Based on the amendments and the following remarks, the Applicants respectfully request that the Examiner withdraw the rejections and pass the application on to issuance.

Claim Rejections – 35 USC §103: The Examiner rejected Claims 1-3. 5-17, 19-30, and 33-38 under §103 as being unpatentable over USPN 6,092,078 issued to Adolfsson in view of USPN 6,751,657 issued to Zothner. To establish a prima facie case of obviousness, the Examiner must show some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings; that there is a reasonable expectation of success; and that the prior art reference (or references when combined) teach or suggest <u>all</u> the claim limitations. MPEP § 2142.

As is made clear below, The Examiner has not established a prima facia case for obviousness as Adolfsson and Zothner fail to teach one or more elements of each of Claims 1-38.

Adolfsson, as suggested by its title, discloses a method for interfacing a network peripheral with a browser. These network peripherals are referred to as "real word I/O devices" 3102 (Adolfsson. col. 3. lines 28-30) and as "data providing means" 3204-3210 (Adolfsson , col. 5, lines 24-26). Examples of a data providing means provided in Figs. 3 and 4 include temperature sensor 3204, temperature set point 3206, and outdoor camera 3208. For a "data providing means 3102" that is controllable, Adolfsson describes including "control means" in a web page where the "control means can be arranged for adjustment by clicking, dragging or typing control parameter." Adolfsson, col. 3, lines 28-32.

As noted by the Examiner, Zothner discloses a method for associating "business rules with actions in terms of the role of a user in the system." Those actions are defined as the selective provision of notifications to one or more users

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based on the users' pre-defined role within the system. See, e.g., Zothner, Abstract.

Zothner provides the following example:

> The NCMS 101 permits notifications to be mapped to the user role 779,
> such that a user 771 receives only those notifications that are assigned
> to a particular role. For example, if a user 771 is an engineer, the user
> 771 can only receive notifications that have been reserved to engineers
> (e.g., network alarms). The user roles 779 can be altered dynamically; for
> instance, the engineer's role can be elevated to a manager on a
> temporary basis. Accordingly, higher level notifications that were
> previously restricted from the user 771 as an engineer can now be
> received by the user 771 in the manager role.

Zothner, col. 19, lines 15-24. Notifications are defined as information sent to a

recipient. That information pertains to a "business rule trigger." Upon the occurrence

of a trigger a corresponding notification is sent to one or more users having a particular

role corresponding to the trigger. Zothner, col. 4, lines 42-55. A notification manager

215 is responsible for sending notifications via e-mail, paging, and faxing. Zothner,

col. 9, lines 47-48.

Claims 1 and 15: Claim 1 is directed to a method for mediating access to

production options and (as amended) includes the following combination of elements.

1. acquiring a user's access request for a production device;
2. accessing data representing production options to which the user does and/or
   does not have permission to access;
3. in response to the user's access request, dynamically generating an interface
   according to the accessed data so that the user interface provides user
   accessible controls for only those options for which the user has permission to
   access; and
4. presenting the user with the generated interface.

Claim 15 is directed to a computer program product that includes a computer useable

medium having computer readable instructions for performing the elements listed

above.

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As noted above, Adolfsson discloses an interface that includes "control means" for manipulating a control parameter for a "data providing means." The Examiner admits that Adolfsson fails to differentiate between control means that the user has permission to access and control means that the user does not. In other words, Adolfsson fails to teach the second element listed above. Instead, the Examiner relies on Zothner, col. 9, line 64 through col. 10, line 8 and col. 19, lines 15-31. The Examiner contends that these sections teach the provision of an interface for a production device, where the interface includes user accessible controls for only those options for which the user has permission to access.

The Examiner asserts that the combination of Zothner and Adolfsson "has been made to show that access permissions (by Zothner) can be used with user accessible controls (by Adolfsson)." Even if the Examiner's assertion is correct, further modification of Adolfson is required to teach the limitations of Claims 1 and 15. In other words, the combination of Adolfsson and Zothner as proposed by the Examiner does not teach all the limitations of Claims 1 and 15.

The cited sections of Zothner merely disclose a method for selectively sending notifications to users based on the users' pre-defined roles in a system. Adolfson discloses providing a user interface that has user accessible controls for controlling a network peripheral. However, neither Adolfsson nor Zothner, individually or combined teaches or suggests *accessing data representing production options to which the user does and/or does not have permission to access* or *in response to the user's access request, dynamically generating an interface according to the accessed data so that the user interface provides user accessible controls for only those options for which the user has permission to access.*

The Examiner notes that Zothner discloses accessing a user profile but mistakenly equates this user profile with data representing production options to which the user does and/or does not have permission to access. The Examiner ignores the fact that Zothner's user profile does not contain data representing production options to which the user does and/or does not have permission to access. The Examiner simply states that "user profiles are assigned roles that control access." Quoting

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Zothner, "each UserProfile is assigned a role, which is used to control security accesses and permissions." Zothner, col. 9, line 67 through col. 10, line1. Zothner discloses that notifications are mapped to user roles so that a particular user only receives those notifications that are assigned to a particular role. Zothner, col. 19, lines 14-17.

Zothner does not teach dynamically generating its notifications based on user profiles. Instead Zothner teaches the selective sending of notifications based on user profiles. As the Examiner admits, Adolfson is silent on this topic. Consequently, Adolfsson and Zothner, even when combined, do not teach dynamically generating an interface according to accessed data representing production options to which the user does and/or does not have permission to access so that the user interface provides user accessible controls for only those options for which the user has permission to access.

For at least these reasons Claims 1 and 15 are patentable over Adolfsson and Zothner. Claims 2, 3, 5-12 and Claims 16, 17, 19-26 are also felt to distinguish over the cited references based at least on their dependence from Claims 1 and 15 respectively.

Claims 7 and 21: Claim 7, depends from Claim 1 and recites that the act of providing comprise:

1. retrieving an interface for the production device, the interface having user accessible controls for selecting production options for the production device;
2. modifying the interface to allow the user access to the controls for only the production options for which the user has permission to access; and
3. presenting the user with the modified interface.

Claim 21 depends from Claim 15 and recites similar elements. Rejecting Claims 7 and 21, the Examiner asserts that Zothner teaches the second element above. Specifically,

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the Examiner relies on Zothner, col. 9, line 64 through col. 10, line 8 and col. 19, lines 15-31.

As discussed above, the cited sections merely disclose the selective provision of notification to users base on pre-defined user roles. Nothing in Zothner or Adolfsson (individually or combined) even suggests *modifying* a retrieved interface to allow the user access to the controls for only the production options for which the user has permission to access in the manner required by Claims 7 and 21.

The Examiner notes that Adolfsson discloses a configuration web page (3222) through which a user selects parameters regarding the presentation of web pages for controlling various network devices. The Examiner mistakenly contends that because Adolfsson discloses presenting web pages generated according to these parameters Adolfsson also discloses modifying a web page. This is simply not true. Granted, Adolfsson discloses obtaining specified parameters from a user and then presenting a user interface for a network device according to those parameters. *See, e.g.,* Adolfsson, col. 5, lines 35-64. Adolfsson does not teach altering a retrieved interface. Instead, Adolfsson expressly states that its web pages are generated (not altered) based on user's selection of parameters. Adolfsson, col. 5, lines 61-64. Generating a web page is not the same as retrieving an interface and then altering that interface.

For at least these reasons Claims 7 and 21 are patentable over the cited references.

Claims 8-12 and 22-26: Claims 8-12 depend at least indirectly from Claim 7 which depends from Claim 1. Claims 22-26 depend at least indirectly from Claim 21 which depends from Claim 15. Claims 8-12 and Claims 22-26 felt to distinguish over the cited references based at least on their dependency from patentable claims.

Claims 13 and 27: Claim 13 is directed to a method for mediating access to production options and includes the following combination of elements

    1. acquiring a user's access request for a production device;

2. accessing a record established for the user, the record containing data representing the production options for the production device to which the user does and/or does not have permission to access;

3. generating a web page for the production device according to the user's record; and

4. presenting the user with the generated interface.

Claim 27 is directed to a computer program product that includes a computer useable medium having computer readable instructions for performing the elements listed above.

As made clear above with respect to Claims 1 and 15, Adolfsson and Zothner, even when combined, do not teach or suggest *accessing a record established for the user, the record containing data representing the production options for the production device to which the user does and/or does not have permission to access* or *generating a web page for the production device according to the user's record.* As the Examiner admits, Adolfsson is silent on the requirement of generating a web page according to user data. Furthermore Zothner does not teach dynamically generating its notifications based on user profiles. Instead Zothner teaches the selective sending of notifications based on user profiles.

For at least these reasons Claims 13 and 27 are felt to distinguish over the cited references.

Claims 14 and 28: Claim 14 is directed to a method for mediating access to production options and includes the following combination of elements.

1. acquiring a user's access request for a production device;

2. retrieving a web page for the production device, the web page having user accessible controls for selecting production options;

3. accessing a record established for the user, the record containing data representing the production options for the production device to which the user does and/or does not have permission to access; and

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4. altering the web page according to the user's record; and

5. presenting the user with the modified web page.

Claim 28 is directed to a computer program product that includes a computer useable medium having computer readable instructions for performing the elements listed above.

As with Claims 7, 13, 21, and 27 discussed above, neither Adolfsson, nor Zothner (individually or combined) discloses _accessing a record established for the user, the record containing data representing the production options for the production device to which the user does and/or does not have permission to access._ Moreover, the combined references fail to teach or suggest retrieving a web page, _altering_ that retrieved web page according to the user's record, and then presenting a user with the modified web page.

The Examiner notes that Adolfsson discloses a configuration web page (3222) through which a user selects parameters regarding the presentation of web pages for controlling various network devices. The Examiner mistakenly contends that because Adolfsson discloses presenting web pages generated according to these parameters Adolfsson also discloses modifying a web page. This is simply not true. Granted, Adolfsson discloses obtaining specified parameters from a user and then presenting a user interface for a network device according to those parameters. _See, e.g.,_ Adolfsson, col. 5, lines 35-64. Adolfsson does not teach altering a retrieved web page. Instead, Adolfsson expressly states that its web pages are generated (not altered) based on user's selection of parameters. Adolfsson, col. 5, lines 61-64. Generating a web page is not the same as retrieving a web page and then altering that web page.

For at least these reasons Claims 14 and 28 are patentable over the cited references.

Claim 29: Claim 29 is directed to a system for managing electronic document production and recites the following elements:

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1. a production device;

2. a client operable to identify a target document, issue a user's access request for a selected production device, and select production options;

3. a production server operable to dynamically generate an interface according to a user's record containing data representing production options to which the user does and/or does not have permission to access;

4. a permission service in electronic communication with the client and the production device, the permission service operable to acquire the access request for the production device and in response to direct the production server to generate an interface according to the user's record so that the user interface provides user accessible controls for only those options for which the user has permission to access, and to direct to the client the generated interface.

The Examiner rejected Claim 29 citing the same sections of Adolfsson and Zothner relied upon for the rejection of Claim 1. For the same reasons Claim 1 is patentable, so is Claim 29. Adolfsson and Zothner, even when combined, fail to disclose or suggest _a production server operable to dynamically generate an interface according to a user's record containing data representing production options to which the user does and/or does not have permission to access_ or a _permission service that is operable to acquire the access request for the production device and in response to direct the production server to generate an interface according to the user's record_.

Claims 30-32 and 34-36: Claims 30-32 and 34-36 are felt to distinguish over the cited references based at least on their dependency from Claims 29.

Claim 33: Claim 29 is directed to a system for managing electronic document production and recites the following elements:

1. a production device;

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2. a client operable to identify a target document, issue a user's access request for a selected production device, and select production options;

3. a production server operable to serve an interface having user accessible controls for selecting production options for the target document;

4. ' a permission service operable to retrieve the interface from the production server for the selected production device, access a user's record containing data representing production options to which the user does and/or does not have permission to access, modify the interface according to the user's record, and direct to the client the modified interface.

As with Claims 7, 13, 14, 21, 27, and 28, discussed above, Adolfsson and Zothner, even when combined, fail to disclose a permission service operable to *access a user's record containing data representing production options to which the user does and/or does not have permission to access* or *retrieve and then modify an interface according to a user record* in the manner required by Claim 33. For at least these reasons Claim 33 is felt to distinguish over the cited references.

Claim 37: Claim 37 is directed to a system for a system for managing electronic document production and includes the following elements.

1. a production device;

2. one or more user records, each user record containing data representing the production options to which the particular user does and/or does not have permission to access;

3. a production server in communication with the production device and operable to generate an interface for that production device according to a user record;

4. a client operable to identify a target document, issue a user's access request for the production device, and select production options;

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5. a permission service operable to access the user's record, direct the production server to generate an interface for the production device according to the user's record, and to direct to the client the generated interface;

6. one or more device records, each device record containing data representing the production options offered by the particular production device;

7. a permission engine operable to parse the device records and generate an web page for managing user records;

8. a device locator operable to detect new production devices; and

9. an update service operable to create a device record for each newly detected production device.

As discussed above, Adolfsson and Zothner, even when combined, fail to disclose a record containing data representing the production options to which the particular user does and/or does not have permission to access. The references do not disclose a permission service capable of accessing a user's record and directing a production server to generate an interface for the production device according to the user's record.

For at least these reasons, Claim 37 is felt to distinguish over the cited references.

Claim 39: Claim 38 is directed to a system for managing electronic document production and includes the following combination of elements:

1. a production device;

2. one or more user records, each user record containing, for each production device, data representing the production options to which the particular user does and/or does not have permission to access;

3. a production server in communication with the production device and operable to serve an interface for that production device, the interface having user accessible controls for selecting production options for the production device;

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4. a client operable to identify a target document, issue a user's access request for the production device, and select production options;

5. a permission service operable to access the user's record, retrieve the interface from the production server, modify the interface according to the user's record, and to direct to the client the modified interface;

6. one or more device records, each device record containing data representing the production options offered by the particular production device;

7. a permission engine operable to parse the device records and generate an web page for managing user records;

8. a device locator operable to detect new production devices; and

9. an update service operable to create a device record for each newly detected production device.

As discussed above, Adolfsson and Zothner, even when combined, fail to disclose a record containing data, for a production device, representing the production options to which the particular user does and/or does not have permission to access. The references do not disclose a permission service capable retrieving an interface from a production server, modifying the retrieved interface, and then directing the modified interface to a client in the manner required by Claim 38.

For at least these reasons, Claim 38 is felt to distinguish over the cited references.

S/N: 09/905,580
Case: 10007646-1
Response to Office Action

Conclusion: In view of the foregoing remarks, the Applicant respectfully submits that the pending claims are in condition for allowance. Consequently, early and favorable action allowing these claims and passing the application to issue is earnestly solicited. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,

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Case: 10007646-1
Response to Office Action